

PS 84 - FEB 23 1984

21

RCRA Part B Permit Application Waste Analysis Plan Review
Lenox China - EPA I.D. No. NJD002325074

Ernest A. Regna, Chief
Solid Waste Branch (2AWM-SW)

Jerry McKenna, Acting Chief
Monitoring Management Branch (2ES-MM)

As part of the agreement between the Air and Waste Management Division (AWM) and the Environmental Services Division (ES), I have attached a complete Resource Conservation and Recovery Act (RCRA) Part B permit application for the Lenox China facility.

Briefly, the facility manufactures ceramic dinnerware and gift ware for the consumer market. Waste is stored in drums and two surface impoundments.

Given the complexity of the facility application, which includes groundwater monitoring data and evaluation, I would anticipate receiving ESD's review and comments on the Waste Analysis Plan and associated documents in approximately six weeks from the date of this memo.

If you have any questions concerning this facility, or the time schedule for receipt of your comments, do not hesitate to contact Mr. Tom Taccione at 8/264-1829.

Attachments

w/o attachments

cc: Barbara Metzger, 2ES
R. Baker, 2OPM-PA

01/07/99 - KOM

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FEB 23 1984

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Attachments

cc: Barbara Metzger, 2ES
R. Baker, 2OPM-PA

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FEB 27 3 58 PM '84
ENVIRONMENTAL PROTECTION
AGENCY
NEW YORK, N.Y. 10007

Tom

PE84 - FEB 23 1984

Mr. Frank Coolick
Chief, Bureau of Hazardous Waste Engineering
New Jersey Department of Environmental Protection
32 East Hanover Street
Trenton, New Jersey 08625

Re: Lenox China
EPA I.D. No. NJDO02325074

Dear Mr. Coolick:

On February 13, 1984, this office received a Resource Conservation and Recovery Act (RCRA) Part B permit application from the facility identified above. The applicant forwarded an additional copy to your office.

In accordance with the procedures for the handling of RCRA Part B permit applications, as outlined in the Cooperative Arrangement Addendum to the FY '83 Memorandum of Agreement (MOA), the State shall provide the Environmental Protection Agency (EPA) with the following material within the time period prescribed below:

1. Part A/Part B information requirements (Notice of Deficiency) within 30 working days of the date of this letter.
2. Additional Part A/Part B information requirements within 10 working days of receipt of a revised Part B application.
3. Recommended facility specific permit conditions, Public Notice, Fact Sheet and Statement of Basis within 150 working days of receipt of the administratively complete Part A/Part B application by the State.
4. Responses to Draft Permit, Public Notice, Fact Sheet and Statement of Basis comments or appeals to final permit conditions within 20 working days of receipt of such comments or appeals by the State.

If you have any questions or need additional information regarding this matter, do not hesitate to contact Tom Taccione at 212/264-1829.

Sincerely yours,

Joel Columbek, Chief
NJ/Caribbean Hazardous Waste Section
Solid Waste Branch

cc: John Trela, Chief
Bureau of Ground Water Discharge Permits, NJDEP

③

4/3 ZI
TAM T.

PE84- UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: MAR 30 1984

SUBJECT: RCRA Waste Analysis Plan (WAP) and Ground Water Monitoring Sampling and Analysis Plan (SAP) Review: Lenox China (NJ002325074) Pomona, N.J.

FROM: John Birri, Quality Assurance Chemist
Monitoring Management Branch

TO: Ernest Regna, Chief
Solid Waste Branch

THRU: Gerard F. McKenna, Acting Chief
Monitoring Management Branch

As requested in your memorandum of February 23, 1984, the WAP and SAP submitted with Lenox China's RCRA Part B permit application have been reviewed. Deficiencies and corrective actions are listed below.

WAP

- The term "process change" (paragraph 1a, page 3-1) should be enlarged upon to indicate some typical changes which could trigger re-analysis.
- The EP Toxicity test mentioned on page 3-2, 6th paragraph, is not described in EPA-600/4-79-020 and the exact methods used (method number in SW-846, 2nd Edition) should be referenced. Also, the test method used for the determination of trichloroethylene has not been, but should be referenced in the manner described above.
- Sampling procedures are not included and should be described by reference to SW-846, 2nd Edition.

SAP

- The sample preservation scheme (page 14-15) must include holding time requirements. Other changes to be made are:
 - Heavy metals - should include type of acid: nitric acid
 - "Nitrogen Species" should be change to "nitrates" and should include type of acid: sulfuric acid
 - Pesticides and Herbicides - should read "No acidification required". They must be extracted within 7 days and extract analyzed within 30 days.
 - TOH - should read "No acidification required".
 - TOC - should show addition of sulfuric acid to a pH less than 2.
- Analyses should have been performed on unfiltered samples. However, since background data have already been collected using filtered samples, filtering should be continued. However, these data should be backed up in the future by simultaneous analyses of unfiltered samples to allow comparison.

- ° It should be stated that the EPA method reference numbers (page 14-6) refer to EPA-600/4-79-020, except for pesticides and herbicides. The methods referenced for pesticides and herbicides are in error and should be taken from those listed under 40 CFR 141.24f. The method references should include extraction or digestion procedures if not included in the method, such as the digestion used prior to the analysis of barium, cadmium, chromium, etc.
- ° It should be made clear that chain-of-custody records are initiated by the sampler, and should contain all appropriate information as recommended in EPA SW-611 (paragraph 6.2.3) "Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities".

5/8/84

5/9

Subject: Review of Financial Responsibility
Provided by Lenox China

From: Helen Beggs, Chief
Hazardous Waste Administration Branch

To: Ernest Regna, Chief
Solid Waste Branch

Financial documents were
reviewed for the following facility

<u>E.P.A. I.D. Number</u>	<u>Facility, Name</u>	<u>Facility, Location</u>	<u>Closure Costs</u>
NJ D00232507	Lenox China	Pomona, New Jersey	\$ 449,100 + 387,700 Contingency \$ 836,800 Total

Lenox is using an irrevocable
Stand-by Letter of Credit for \$1,000,000
with a concomitant trust fund to
assure closure costs at the facility
in New Jersey. Closure cost estimates are
not detailed, but the company added
a large contingency factor to the estimates
to assure coverage of for all possible costs.

The financial documents fulfill New Jersey's requirements and, also, comply with 40 CFR 264.143(d) and 264.151(d) given the changes necessitated by compliance with New Jersey law.

An insurance certificate indicates that the facility has liability coverage for sudden accidental occurrences of \$16,000,000 each occurrence and annual aggregate. The facility has also provided for coverage for non-sudden occurrences of \$15,000,000 each occurrence / annual aggregate. While more than the required coverage is provided, a certificate as per the New Jersey requirements and the federal regulations [40 CFR 264.151(j)] has not been submitted.

Conclusions and Recommendations:

The facility has provided documentation which indicates that its closure costs have been assured.

An insurance certificate worded as per 40 CFR 264.151(j) or the analogous

New Jersey regulations should be submitted as part of the Part B application.

if you have any questions,
please call Leila Meltzer at
264-0939.

21

LENOX

CHINA • CRYSTAL

POMONA NEW JERSEY 08240

~~PE85~~ June 28, 1985

Mr. Frank Coolick, Chief
Bureau of Hazardous Waste Engineering
Division of Waste Management
NJ Dept. of Environmental Protection
32 E. Hanover St.
CN 028
Trenton, NJ 08625

Re: Lenox China, Second Administrative Completeness Review
Part A and Part B Hazardous Waste Facility Permit Application,
EPA ID No. NJD002325074

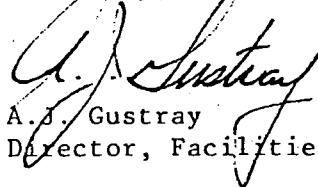
Dear Mr. Coolick,

On June 25, 1985, Lenox China received a request from the Bureau of Hazardous Waste Engineering to submit additional information in support of a previously filed RCRA Part B permit application.

We cannot comply with the thirty day response time because there is a significant number of comments to be addressed and a considerable amount of material to be compiled for presentation.

We respectfully request a sixty day extension for this data submission in order to provide as complete a document as possible. We will respond to the comments/requests of the second administrative review on/before September 7, 1985.

Sincerely,



A.J. Gustray
Director, Facilities Engineering

AJG/pm

CC: Scott Baker
NJDEP
Division of Waste Management
Bureau of Hazardous Waste Engineering
CN 028
32 E. Hanover St.
Trenton, NJ 08625

Kathryn Lapham
NJDEP
Division of Water Resources
1464 Prospect St.
Trenton, NJ 08625

Ken Siet
NJDEP
Division of Water Resources
1464 Prospect St.
Trenton, NJ 08625

Angel Chang ✓
USEPA Region II
Solid Waste Branch
26 Federal Plaza
New York, NY 10278

Robert Saar
Geraghty & Miller, Inc.
North Shore Atrium
6800 Jericho Turnpike
Syosset, NY 11791

Let's protect our earth



21
ENVIRONMENTAL
PROTECTION AGENCY
REGION II

88 DEC -9 PM 12:03

HAZARDOUS WASTE
FACILITIES BRANCH

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT

Michele M. Putnam
Deputy Director

Hazardous Waste Operations

John J. Trela, Ph.D., Director
401 East State St.
CN 028
Trenton, N.J. 08625-0028
(609)633-1408

Lance R. Miller
Deputy Director

Responsible Party Remedial Action

Stephen F. Lichtenstein
Senior Vice President
Lenox, Inc.
100 Lenox Drive
Lawrenceville, NJ 08648-2394

PESS - DEC 06 1988

RE: Hazardous Waste Permit Application, Lenox, Inc., Pamona
EPA ID NO. NJD 002 325 074 Thirty Day Extension For Request

The Bureau of Hazardous Waste Engineering (Bureau) is in receipt of your letter dated November 18, 1988 requesting a sixty (60) day extension to answer the Bureau's letter of October 13, 1988 to Mr. Albert Gustray of your staff.

The Bureau realizes that the up coming holidays decrease the time available to resolve the engineering and legal matters required to complete your submittal. Thus, the Bureau hereby grants Lenox, Inc. a sixty (60) day extension to submit the required information provided that Lenox supply the Bureau with a thirty (30) day update of submittal progress. The new deadline for submission is December 12, 1988 for the progress report and January 11, 1988 for complete submission. Failure to submit the required information on time may result in enforcement action.

If you have any questions, please call Mr. James Bridgewater of my staff at (609)292-9880.

Very truly yours,

Ernest J. Kuhlwein, Jr., Chief
Bureau of Hazardous Waste Engineering

EP52/lm

cc: Barry Tornick, USEPA-Region II
Thomas Downey, SFO

leg - copy to Andy P.

LENOX

INCORPORATED
100 LENOX DRIVE
LAWRENCEVILLE, NEW JERSEY 08648-2394

ENVIRONMENTAL
PROTECTION AGENCY
REGION II

89 FEB 13 AM 11:50

HAZARDOUS WASTE
FACILITIES BRANCH

LOUIS A. FANTIN
FIRST ASSISTANT GENERAL COUNSEL
ASSISTANT SECRETARY

PEBA - February 8, 1989 ✓

Mr. Thomas Sherman
Acting Chief
Bureau of Hazardous Waste Engineering
State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
401 East State Street
CN 028
Trenton, New Jersey 08625-0028

Re: Hazardous Waste Permit Application
Lenox, Inc.
EPA ID No. NJD 002 325 074

Dear Mr. Sherman:

With respect to the above referenced permit application and the information requested in Mr. Ernest J. Kuhlwein's letter of October 13, 1988, Lenox has the following response:

1. It is Lenox's position that the "Sludge Degreaser Pit" is not a Treatment, Storage or Disposal Facility ("TSDF"). This item may have been included in our RCRA application as a "protective filing" measure only because at the time, there was some ambiguity in the law regarding how much information was required to be included. The degreaser pit receives TCE sludge from a degreaser located inside the building. The hot fluid sludge drains by gravity to the storage drum located at the degreaser pit along the outside of the plant building. The drum is then transported by forklift to the TCE drum storage pad where the waste awaits shipment off site for incineration. No more than one 40 gallon drum with TCE sludge is present at a time, and it remains at the pit for no longer than three days. I have enclosed a drawing entitled "Degreaser Filling Station Exist. Conditions", together with a copy of Lenox's procedures for the control and handling of TCE sludge. Because the TCE degreaser pit is not a TSDF, we request that it not be considered a RCRA unit.

2. Two previously identified RCRA TSDFs, the Slip Basin and the Glaze Basin, no longer require operating Part B permits because they have been or will be closed.

3. Because the TCE drum storage pad is the only other RCRA TSDF requiring a Part B permit and because Lenox has determined that it is feasible

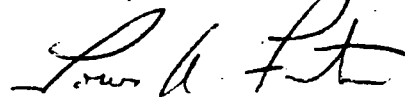
to ship the TCE waste off site for incineration within ninety (90) days, Lenox has determined that it does not need a RCRA Part B permit for any unit at its Pomona plant. Accordingly, Lenox hereby gives you notice that it will withdraw its RCRA Part B application and intends to submit an appropriate closure plan for the TCE drum storage pad.

4. With respect to the request in Mr. Kuhlwein's October 1988 letter for a Soil Sampling and Analysis Plan for the TCE drum storage and degreaser pit, I have been advised that Geraghty & Miller will mail Plan to you tomorrow.

If you have any questions, please call me at (609) 896-2800 extension 428. It is my understanding that you will communicate shortly with Lenox regarding the State's determination with respect to the removal of "Sludge Degreaser Pit" from our RCRA application and the State's request regarding closure of the TCE drum storage pad.

Very truly yours,

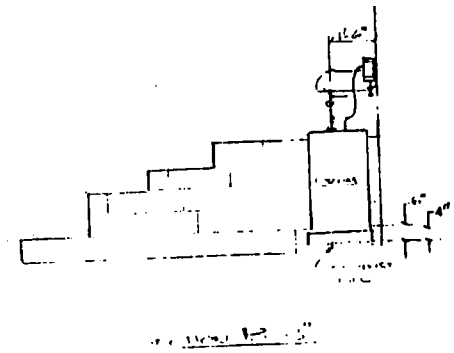
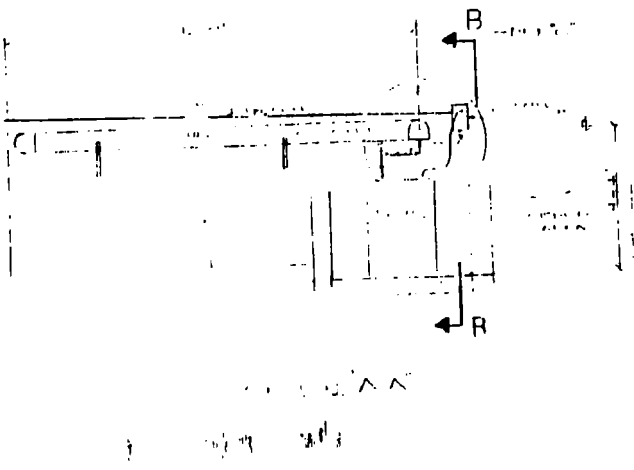
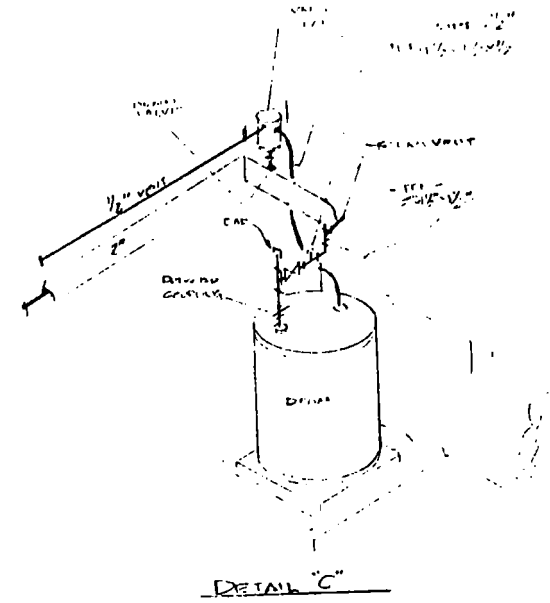
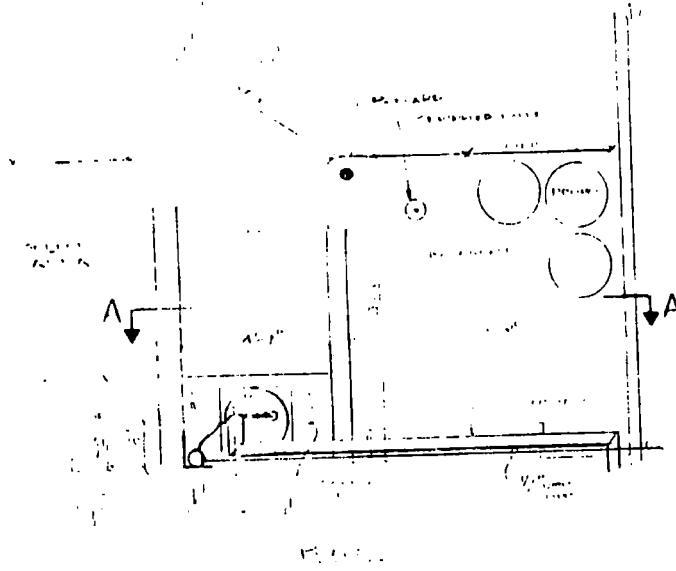
LENOX, INCORPORATED



Louis A. Fantin

LAF:ct

cc: B. Tornick, USEPA, Region II
S. Kinsel, DWR-BGWQC
R. Saar, Geraghty & Miller
R. Inyard, Eder Associates
A. Gustray, Consultant
N. Kuehnast, Lenox
S. Piotrowski, Lenox



TITLE		SCALE	DRN. / 11/1/58	DATE 11/2/58	REV	REVISION DESCRIPTION	BY
DEGREASER FILLING STATION		1/4"=1'-0"	APPR.	DATE	LET		DATE
TOLERANCES UNLESS SPECIFIED DEC. ±		MATERIAL	—	—	LENOX, INC.		
FRAC. +					DWG. No. B-1132-43		

POMONA EPA 020

REVISION NO.: _____

EFFECTIVE DATE: _____

REVIEW DATE: _____

Page 1

CONTROL AND HANDLING OF WASTE TRICHLOROETHYLENE SLUDGE

PURPOSE:

- . To define when trichloroethylene (TCE) becomes waste.
- . To provide a training base.
- . To restrict handling to trained personnel.

SCOPE:

- . Hazardous waste characterization
- . Hazardous waste labeling
- . On-site movement
- . Storage
- . Waste shipments/hazardous waste manifest
- . Spill clean up
- . MSDS

PROCEDURE:

1. Hazardous Waste Characterization

A. Define TCE sludge as a waste

The TCE sludge becomes a waste material when the sludge that has been pumped into a storage drum in the TCE sump, has cooled and is disconnected from the draw down system. The material should then be managed as a hazardous waste.

B. Waste Analysis

A representative sample of the sludge is obtained quarterly for analysis (see RCRA Part B app P. 3-6). The sludge is to be analyzed for volatile organic compounds. Waste analysis information should be kept on site until facility closure.

2. Hazardous Waste Labeling

- ##### A.
- As soon as the sludge drum has been disconnected from the degreaser draw down system the material is a waste, as stated above, and should be labeled at that time. An example of the hazardous waste label is shown in exhibit A. The only piece of information that need not be filled in at that time is the manifest number. This should be filled in just prior to waste shipment.

3. On-site Movement

- A. On-site movement of the waste should only be performed by fork lift or hand truck.
- B. Any operator who moves the waste by fork lift should have documented training in fork lift operations and be trained in the hazards and spill clean up procedures for the waste.

4. Storage

- A. The only facility permitted for the storage of the waste is the drum storage pad (see exhibit B).
- B. A note should be made in the daily RCRA inspection log as to the number of waste drums on the drum pad. Additional comments should be made as to poor drum conditions, improper placement of waste drums, or missing or deficient labels on drums.

5. Waste Shipments/Hazardous Waste Manifest

- A. Scheduling of waste shipments should be made in such a way so as to allow for the pick up of the waste every 90 days. This may require the scheduling of a shipment as soon as, or shortly after, a shipment has been made.

6. Hazardous Waste Manifest

- A. A hazardous waste manifest must accompany each waste shipment.
- B. The manifest should be completed as shown in exhibit C.
- C. The manifest document number (line 1) will change for each shipment and should be kept so as to avoid duplication of numbers.
- D. The transporter (line 5) and EPA I.D. number (line 6) may change from shipment to shipment and should only be filled in once the transporter is on site. The State transporter I.D. number (line C) and phone number (line D) should be obtained directly from the driver.
- E. The disposal facility (line 9) will remain the same until further notice.
- F. The proper shipping (line 11) for the TCE sludge is:

WASTE ORM-A, N.O.S.
ORM-A NA1693 (F001)

G. The appropriate number of containers, container type, quantity and unit should be entered into lines 12, 13, and 14 respectively.

H. The waste number (line I) for the waste is F001.

I. In the appropriate box for additional information (line J) the following should be entered:

25% Trichloroethylene
75% Asphalt, S, T

J. An authorized person should print and sign their name and date the manifest (line 16).

K. The transporter should do the same on line 17.

L. If a New Jersey manifest is used, distribute copies as follows:

Copies 1 through 5 go with the
transporter.

Copies 6 and 7 are sent by Lenox
to the State of New Jersey.

Copy 8 is retained in Lenox files.

Copy 3 will be returned by the
disposal company and should
be attached to Copy 8 for
that specific shipment.

M. A land disposal restriction disclaimer will need to be completed as shown in Exhibit D and accompany the waste manifest. Retain a copy of this disclaimer for the files.

N. All hazardous waste manifests should be kept on site and retrievable until facility closure.

7. Spill Clean Up

A. Clean-up equipment

1) Protective clothing

a) rubber gloves

b) rubber boots

c) pe/tyvek suit

- 2) Respiratory protection
 - a) Self Contained Breathing Apparatus
- 3) Clean-up materials
 - a) saw dust, absorbent pads or absorbent boom
 - b) polyester lined fiber drum
 - c) shovel

B. Clean-up procedures

- 1) Notify guard on duty to obtain help and to help secure area of spill.
- 2) Don protective clothing and respiratory protection equipment.
- 3) Stop source of leak if at all possible.
- 4) Protect from run off to surface waters and ground waters.
- 5) Confine spill to as small an area as quickly as possible.
- 6) Absorb with sawdust or other absorbent material.
- 7) Shovel into polyester lined fiber drum.
- 8) Remove any remaining liquid or contaminated soil to lined fiber drum. If possible, wet vacuum area and dispose of waste water with other soil and liquids.
- 9) Once the spill has been contained and all remediation activity accomplished, dispose of contaminated clothing in lined fiber drums.
- 10) Notify guard of spill of containment of spill.
- 11) Comply with spill notification requirements.
- 12) Maintenance staff should initiate an incident investigation and file an incident report of all spill related activities.

C. Chemical Exposure

If any persons are exposed to TCE, refer to MSD sheet for first aid information and seek medical attention.

N.B. Due to the extremely low drinking water standards with respect to TCE, never leave TCE spills unaddressed or flush to sewers surrounding grounds.

8. MSDS

See exhibit D.

Exhibit A

HAZARDOUS WASTE

ORM-A

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T.
SHIPPING NAME WASTE ORM-A, N.O.S. ☐ OR NA 1693

GENERATOR INFORMATION:

NAME LENOX CHINA
ADDRESS TILTON ROAD
CITY POMONA STATE NJ ZIP 08240

EPA ID NO. NJD 002325074 EPA WASTE NO. FC01

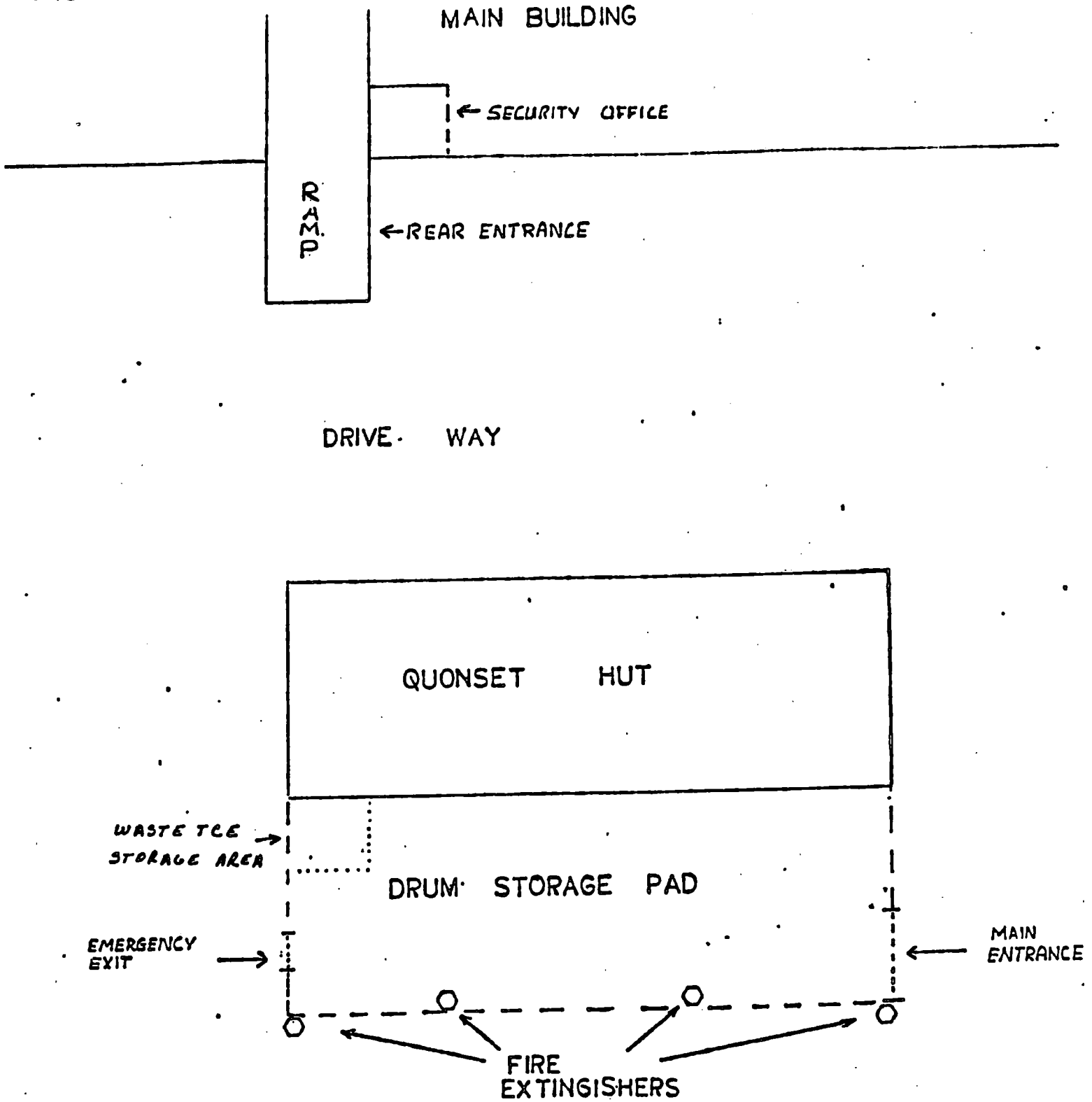
ACCUMULATION START DATE MANIFEST DOCUMENT NO.

Fill in date when
manifest is removed from
manifest system.

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

Fill in only after all
manifest data has been
collected and manifest
has been correctly typed.

DRUM STORAGE PAD DIAGRAM





State of New Jersey
Department of Environmental Protection
Division of Waste Management
CN 028, Trenton, NJ 08625

Use print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved EPA 861-102-0102-12, 1-7-79

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's U.S. EPA ID No.		2. State of 1		3. Information in this manifest is not required by Federal law.			
3. Generator's Name and Mailing Address Lenox China Tilton Road, Pomona, NJ 08240		N J D 0 0 2 3 2 5 0 7 4		8 7 0 1 4		A. State Manifest Document Number: NJA 0252354			
4. Generator's Phone: 609 641-3700		6. US EPA ID Number		C. State Transporter ID		B. State Gen. ID: SAME			
5. Transporter 1. Company Name: S-J Transportation, Inc.		N J D 0 5 5 2 7 9 6 1 1		NJDEP SO 3978-20568					
7. Transporter 2. Company Name:		8. US EPA ID Number		D. Transporter's Phone		E. State Transporter ID			
9. Designated Facility Name and Site Address Rollins Environmental Services (NJ) Inc. Rt. 322 Bridgeport, NJ 08014		10. US EPA ID Number		F. Transporter's Phone		G. State Facility's ID			
N J D 0 5 3 2 8 8 2 3 9				H. Facility's Phone: (609) 467-3100					
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total Quantity		14. Waste No	
a. WASTE ORM-A, N.O.S.				No. 1		Total Quantity 1		P F001	
b. ORM-A NA 1693 (F001)				1		12121010		P F001	
c. SAMPLE									
d. E									
15. Additional Descriptions for Materials Listed Above 25% Trichloroethylene 75% Asphalt, S, T				K. Handling Instructions for Materials Listed Above					
16. Special Handling Instructions and Administrative Information									
17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment have been accurately described above by proper shipping name and hazard class, packed, marked, and labeled, and are in a respects in proper condition for transport in highway, according to applicable international and national government regulations and all applicable state laws and regulations. Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002 of RCRA, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the lowest practicable level, and I am currently practicing the method of treatment, storage, or disposal currently available to me which minimizes the volume of waste sent to landfills and the environment.									
18. Transporter 1. Agency or Department of Receipt of Material									
19. Transporter 2. Agency or Department of Receipt of Material									
20. Transporter 3. Agency or Department of Receipt of Material									
21. Transporter 4. Agency or Department of Receipt of Material									
22. Transporter 5. Agency or Department of Receipt of Material									

4007070034

Exhibit D

ATTACHMENT A

LAND DISPOSAL RESTRICTIONS INFORMATION - RESTRICTED WASTE FOR INCINERATION

Customer Name: LENOX CHINA
 Address: TILTON ROAD
POMONA, NJ 08240

EPA ID Number: NJD 002325074
 Reference Number: L- 6861

Under manifest number NJA 0252354 we are shipping to you for incineration, a waste stream classified by EPA Hazardous Waste Number F001.

This stream contains the following constituents identified in Table CCWE of 40 CFR 261 (copy below) and must be treated at least to the level specified below:

<u>Constituent</u>	<u>Treatment Standard</u>
<u>TRICHLOROETHYLENE, 25%</u>	<u>0.091 mg/l</u>
<u>SAMPLE</u>	
<u>LE</u>	

TABLE CCWE - CONSTITUENT IN WASTE EXTRACT

	Concentration (in mg/l) Wastewaters containing spent solvents	All solvents
..... F001-F005 spent solvents		
Acetone	0.05	0.
n-Butyl alcohol	5.0	5.
Carbon disulfide	1.05	4.
Carbon tetrachloride05	.
Chlorobenzene15	.
Cresols (and cresylic acid)	2.82	.
Cyclohexanone125	.
1,2 - dichlorobenzene68	.
Ethylacetate05	.
Ethylbenzene05	.
Ethylether05	.
Isobutanol	5.0	5.
Methanol25	.
Methylene chloride20	.
Methylene chloride (from the pharmaceutical industry)	12.7	.
Methylene ethyl ketone	0.05	0.
Methyl isobutyl ketone	0.05	0.
Nitrobenzene	0.65	0.
Pyridine	1.12	0.
Tetrachloroethylene	0.79	0.
Toluene	1.12	0.
1,1,1. Trichloroethane	1.05	0.
1,2,2. Trichloro - 1,2,2 trifluoroethane	1.05	0.
Trichloroethylene	0.062	0.
Trichlorofluoremethane	0.05	0.
Xylene	0.05	0.

Authorized representative signature

Frederick J. ManleyDate 9/4/87

Print or type name

FREDERICK J. MANLEYTitle ENVIRONMENTAL
ENGINEER

WASTE SAFETY SHEET

LENOX CHINA
POMONA, NJWaste Designation: ACID RESIST SLUDGE# L-6861EPA # F001

STATE # _____

CHEMICAL COMPOSITION:

Component Name	Formula	Range W %	Flash Pt. °F
Asphaltum		20-35	
Wax		30-45	
Trichloroethylene	CHCl_2Cl	10-40	
Varnish		1-4	
Bone black		1-3	
Oil		1-2	
Xylene	$\text{C}_6\text{H}_4(\text{CH}_3)_2$	0-1	81
Naptha		0-1	

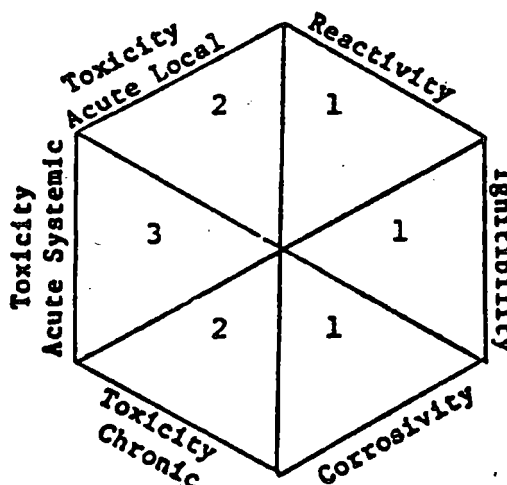
PHYSICAL PROPERTIES:

Physical Character: SludgeColor: Dark Odor: _____Flash Point ☐ <100°F ☐ <140°F ☒ >140°FINSPECTION FOR RECEIPT APPROVAL: N/A

Parameter	Min. - Limits - Max.

HAZARD CODE INFORMATION

4=Red-Severe 3=Orange-High



2=Yellow-Moderate 1=Blue-Low

TREATMENT METHOD/PROCESS NOTES:

Store only on drum storage padShip off site for treatment via incineration☐ There is a special procedure for this waste.

CHEMICAL COMPATIBILITY:

No unusual reactivity.

REQUIRED PERSONAL PROTECTIVE EQUIPMENT:

☒ Hard Hat☒ Safety Glasses☒ Air-Supplying
Respirator☒ Protective Suit☒ Rubber Gloves☐ Splash Goggles
or Face Shield☐ Air-Purifying *
Respirator☐ Other _____☒ Rubber Boots

Type: _____

*Spill clean up or repack

2/8/88

Date Completed

FD Manley
Author's Name

PROCEDURE SIGN-OFF.

PROCEDURE: Pomona EPA 020

TITLE: Control and Handling of Waste Trichloroethylene Sludge

EFFECTIVE DATE:

REVIEW DATE:

	<u>INITIAL</u>	<u>DATE</u>
PREPARED BY: F. J. Manley Environmental Engineer	<u>FJM</u>	<u>5/20/88</u>
APPROVED BY: R. M. Hopkins Plant Manager	<u>RMH</u>	<u>5/24/88</u>
G. Barnum Plant Manufacturing Engineer	<u>GB</u>	<u>5/25/88</u>
C. Asselta Director, Human Resources	<u>CA</u>	<u>5/27/88</u>

ROUTING AND TRANSMITTAL SLIP

Date

11/1/93

TO: (Name, office symbol, room number, building, Agency/Post)

Initials

Date

1.

Pat P.

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

- PLS respond to the message on the cover sheet.

DGW
HWA

- They want to submit the HWRP @ a later date in accordance w/ NJ's W.M. law.

We had a similar situation w/ one of UJ's facilities - see her.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Mitc

Phone No.



STEPHEN F. LICHTENSTEIN
SENIOR VICE PRESIDENT
SECRETARY AND
GENERAL COUNSEL

TELECOMMUNICATIONS COVER SHEET

DATE: FE93 - 01/04/93
DELIVER TO: Mike Poetzsch
FROM: STEPHEN F. LICHTENSTEIN
NUMBER OF PAGES (INCLUDING COVER SHEET) 3

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MESSAGE: Please give me a clarification of whether the HWRP is due July 1, 1993 or July 1, 1994 under the Permit. The effective date of the Permit is December 1, 1992.

TRANSMITTED BY: Chris
DATE: 01/04/93 TIME: _____

Please call sender at Lenox, Incorporated (609)-844-1310 or (609)-844-1310 if this fax message is received incomplete or not legible. Do this as soon as possible after the transmission is completed. Also, please call if for some reason the transmission stops due to technical problems.

THANK YOU FOR YOUR COOPERATION.

MODULE IV - WASTE MINIMIZATION

- A. SUBMITTAL REQUIREMENTS. Pursuant to 40 C.F.R. § 264.73(b)(9), and Section 3005(h) of the Act, 42 U.S.C. § 6925(h), the Permittee must submit to the Regional Administrator, at least annually, a waste minimization report by the owner or operator. This report and all accompanying documentation will be submitted by July 1 of each year after the effective date of this Permit.
- B. WASTE MINIMIZATION REPORT. The Permittee must certify that:
1. A program is in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable; and
 2. The proposed method of treatment, storage or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.
- C. HAZARDOUS WASTE REDUCTION PLAN (HWRP). The Permittee shall submit a HWRP by July 1 of the first year following permit issuance. The HWRP shall be updated at least biennially to reflect changes in the HWRP, and submitted by July 1 of that year. The HWRP shall include at a minimum, the following information:
1. Identify amounts and types of all acute hazardous waste generated by waste stream.
 2. Identify amounts and types of non-acute hazardous waste by waste stream for streams greater than five (5) tons and,
 3. Identify at least 90% of all non-acute hazardous waste generated at the facility.
 4. Describe source of generation and waste management method for each waste stream.
 5. Provide list of technically feasible and economically practicable waste reduction measures.
 6. Provide a program plan and schedule for implementing technically feasible and economically practicable waste reduction over time.

The following guidance documents should be used in developing the HWRP:

Waste Minimization Opportunity Assessment Manual.
EPA/625/7-88/003, July 1988. Available through: EPA, Office of Research and Development, Cincinnati, Ohio 45268, tel. 513/569-7562 or NTIS, 5285 Port Royal Road, Springfield, VA 22161, tel. 703/487-4600.

Region II HWRP Requirements.
Available through EPA Region II, Hazardous Waste Facilities Branch, Andrew Bellina, tel. 212/264-0505.

New York State Waste Reduction Guidance Manual
March 1989.

New York State Waste Reduction Guidance Manual Supplement. December 1990. Available through the New York State Department of Environmental Conservation, Bureau of Pollution Prevention, 50 Wolf Road, Albany, New York 12233-7253, tel. 518/485-8400.

D. IMPLEMENTATION OF WASTE REDUCTION TECHNIQUES.

The Permittee shall implement the feasible waste reduction techniques in accordance with the schedule in the HWRP.

STATUS OF RCRA PERMIT ACTIVITIES

3 COPIES

Check
to see if
these codes
have
been

FACILITY NAME & EPA ID NO.

DATE
APPLICATION
RECEIVED BY DEP

COMPLETENESS
REVIEW
ACCOMPLISHED

ADDITIONAL INFORMATION
REQUESTED

DRAFT PERMIT

E. I. DuPont de Nemours & Co.
Deepwater, Salem County
EPA ID NO. NJD002385730

8/27/83
Interest
into POS

12/5/83

Additional info. received
on 9/14/84. Administratively
complete 10/10/84 ✓

Vineland Chemical Co., Inc.
Vineland, Cumberland County
EPA ID NO. NJD002385664

J.P.
1/12/84
Direct from
Facility Trans-
mittal Letter
1/20/84

Part A
Clarification
Requested
2/15/84

8/15/84 Facility Status
Resolved, S01 Deleted -
Only Remaining Activities
are S04 and T01. Faci-
lity is to be IWMF Per-
mitted. ✓

PG 87-2/2/87

Ciba Geigy Corporation
Dover, Ocean County
EPA ID NO. NJD001502517

11/23/83

1/30/84

Draft prepared 1/30/84
Waiting for DWR review
Draft handled to DWR for
forwarding to EPA 6/84.

not in

Lenox China
Pamona, Atlantic County
EPA ID NO. NJD002325074

2/23/84

Draft to DWR
6/84 for EPA
Waiting for DWR
preparation
11/1/84.

File

NJD 002 325 074

00/00/00

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